

Letter For Electronic Distribution

Original signed letter on file at the following address:

Nevada Division of Environmental Protection,
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April 12, 2000

Mr. John Dirickson, P.E.
Environmental Engineer
Naval Air Station, Fallon
Public Works Department
Environmental Division-Code 187JD
4755 Pasture Rd.
Fallon, NV 89496

RE: NDEP Response to Site 24, The Road Oiling Area
Draft Final Decision Document, August 27, 1999, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24
Remedial Investigation/Feasibility Study
Naval Air Station Fallon

Dear Mr. Dirickson:

Nevada Division of Environmental Protection (NDEP) staff has reviewed NAS Fallon's Report entitled *Decision Document, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24, Draft Final*, dated August 27, 1999. This report was prepared in response to a series of NDEP letters which commented on NAS Fallon's report entitled *Record of Decision, Sites 4, 5, 7, 8, 9, 10, 11, 15, 17, 18, 19, 23, 24, 25, 26, 27 Naval Air Station Fallon* (ROD), dated June 5, 1998. Due to significant changes between the Draft Final Decision Document and the Record of Decision, the referenced Draft Final Decision Document was reviewed as a draft document instead of a draft final. NDEP's comments on Site 24, The Road Oiling Area, are addressed in this letter.

Formal approval of a "No Further Action" Decision Document is based on the extent of the investigation and remediation, an understanding of the nature and extent of contamination, documentation in the administrative record, and post closure care which includes institutional controls, land use restrictions, and/or post-closure monitoring. The NDEP is concerned that documentation to support the "No Further Action" recommendation in the Draft Final Decision Document for Site 24 does not appear to be included in the administrative record. In a letter dated January 21, 1999, the NDEP requested that supporting documentation (including boring logs with soil screening results, laboratory analytical reports, and the RI/FS Sampling and Analysis Plan) be provided to the NDEP. These documents have not been provided. In consideration of these factors, the NDEP cannot concur with "No Further Action" for Site 24 at this time.

The NDEP will consider concurrence with "No Further Action" for Site 24 when supporting documentation is provided. If supporting documentation cannot be located, then additional sampling may be required. NAS Fallon needs to appropriately address NDEP's comments on the Draft Final Decision Document before the

NDEP can approve "No Further Action" for Site 24. NDEP's comments on the Site 24 Draft Final Decision Document are attached to this letter. NAS Fallon has not responded to many of NDEP's comments presented in the letter dated January 21, 1999. Comments in that letter which were not addressed in the Draft Final Decision Document are reiterated in the comments attached to this letter.

Since many of the issues regarding Site 24 have been on-going and unresolved for an extended period of time, please provide a time frame for addressing the comments in this letter within 30 days. If we as project managers cannot agree on a process to resolve these issues, the NDEP will need to initiate the dispute resolution process. If you have any questions, or need further clarification, please do not hesitate to contact me at (775) 687-4670, extension 3053.

Sincerely,

Jeffrey J. Johnson, P.E.
Geological Engineer
Bureau of Federal Facilities

JJJ/js

cc:

Douglas Bonham, NAS Fallon
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Paul Liebendorfer, NDEP/BFF
Karen Beckley, NDEP/BFF
Bob Kelso, NDEP/BCA
Jim Lukasko, NDEP/BCA

**COMMENTS ON THE DRAFT FINAL DECISION DOCUMENT
SITE 24, THE ROAD OILING AREA**

1. Page 1, third paragraph: The Draft Final Decision Document states: “*The decision not to undertake a remedial action for this site is deemed consistent with the factors set forth within the National Contingency Plan (NCP) 40 CFR part 300, and Nevada Administrative Code (NAC) Sections 445A.226 through 445A.22755 and 459,9973. This decision was based on one or more of the following:*” (three bulleted reasons follow).

The NDEP cannot concur with the above statement. Supporting documentation appears to be missing from the administrative record. Therefore, NAS Fallon does not appear to be in full compliance with 40 CFR Part 300, Subpart I: Administrative Record for Selection of Response Action. See comments **8** and **9**.

2. Page 1, last paragraph in Section I: The Draft Final Decision Document states: “*The Nevada Division of Environmental Protection (NDEP) has reviewed this document and concurred with this decision. There are not any nationally significant or precedent setting issues for this site.*”

The NDEP concurrence with “No Further Action” for this site in letters dated May 17, 1994, and August 21, 1997 was based on the assumption that reasonably supporting documentation would be formally presented in the Decision Document. However, several issues which are detailed in the comments in this letter have not been acceptably supported by documentation. Because supporting documentation has not been provided, the NDEP cannot sign off on a “No Further Action” Decision Document for Site 24 at this time. The NDEP will consider “No Further Action” after these issues are resolved.

3. Page 5, Section F, last paragraph: The Draft Final Decision Document states “*The Draft Decision Document dated November 1995 for 6 sites including Site 24 was published on 31 January 1996 in the Lahontan Valley News and the Fallon Eagle Standard. These community participation activities fulfill the requirements of the CERCLA: Section 113(k)(2)(B)(I-v) and 117(a)(2). The Administration Record is available for review at the Churchill County Library.*”

The draft Decision Document dated November 1995 (received by NDEP January 23, 1996) was never completed by NAS Fallon. The NDEP provided comments on the November 1995 draft Decision Document in a letter dated March 5, 1996. Due to the elapsed time since the original draft Decision Document was published, NAS Fallon’s failure to respond to NDEP’s comments and complete the document, and the fact that the current document will contain different information, community participation during review and approval of the revised Draft Final Decision Document may need to be addressed again.

Based on Appendix A in the Draft Final Decision Document (Administrative Record), the documents listed below were not included in the administrative record. These documents should be listed because they contain data, factual information, and analyses that form the basis for the selection of the response action.

- C Progress Reports that include data or interpretations for Site 24. This request is consistent with NDEP’s letter dated March 5, 1996.
- C Logs, with soil screening results, for the five borings drilled during the RI/FS.
- C Laboratory analytical reports

4. Page 5, Section III. Investigation Summary: The Draft Final Decision Document states “*The Phase II of the RI Program for Site 24 drilled 5 soil borings along Perimeter Road. No monitoring wells or groundwater investigation was conducted for Site 24, but Group II Sites IR program investigation included installing 11 monitoring well and drilling 79 groundwater test borings and 8 piezometers. Four of the monitoring wells and 25 groundwater test borings were installed along Perimeter Road.*”

Monitoring wells located along Perimeter Road adjacent to the Group II Sites are spread out over a distance of approximately 2000 feet. The length of the unpaved portion of Perimeter Road is approximately 25,500 feet. Figure 2 in the Draft Final Decision Document shows Site 24 and the locations of the 5 soil borings. The Group II wells (monitoring wells, groundwater test borings and piezometers) are not shown on Figure 2, but are shown on Figure 3. Figure 2 should be modified to show where the Group II investigation wells are located with respect to Site 24 so that the reader can determine how Figure 3 fits in with Figure 2.

In addition to the above, the drawings need to include the following:

- C The drainage canals need to be clearly labeled.
- C The unnamed tributary to the Lower Diagonal Drain needs to be added to the drawings.
- C Base wide groundwater contours (such as the contours provided on Figure 9-1 of the January 1997 semi-annual progress report) need to be included.

Some of the borings at Site 24 are located well over one mile apart. The Decision Document should address the potential for contaminated soil to exist between the boring locations.

5. Page 6, Section B, Groundwater: The Draft Final Decision Document states “*No groundwater investigation was conducted at Site 24. However, the Phase II of the RI Program investigation for Group II included installing 11 monitoring well and drilling 79 groundwater test borings. See Figure 4 for Group II Plume Map. Four of the monitoring wells and 25 groundwater test borings were installed along Perimeter Road. See Table 2 for groundwater testing results. The result of this analysis indicated that detectable contamination of the groundwater at Site 24 did not exist.*”

Table 2, which lists analytical results for groundwater samples collected from the Group II wells, is incomplete. The table summarizes analytical data from the 1991 sampling events. However, several more recent sampling events were conducted. Analytical results from these sampling events also need to be included on the table.

Groundwater samples collected from groundwater test holes were not analyzed. The presence of contaminants in these samples was evaluated by qualitatively assessing the presence of volatile organic compound (VOC) vapors in the head space above the water sample in a jar. Specific contaminants and concentrations were not analyzed. Data collected from groundwater test holes provide evidence that VOCs may or may not exist in groundwater, but they neither confirm the lack of contamination nor indicate the potential for semi-volatile organic compounds (SVOCs) to exist in groundwater. If NAS Fallon desires to include data collected from groundwater test holes in this section, then a brief description of sample collection and analytical methods needs to be provided in the Decision Document. Limitations of the procedures also need to be discussed.

6. Page 7, Section V, Future Activity at Site 24: NAS Fallon stated that administrative controls will be imposed on Site 24. Please be advised that administrative controls are subject to future audit.

7. Page 7, Section VI, Recommendations: The Draft Final Decision Document states “*This decision document represents the selection of a no action alternative and subsequent closure for Site 24 at NAS Fallon, Fallon, Nevada. The no action alternative was developed in accordance with CERCLA as amended and is consistent with the NCP. This decision is supported by the documents in the administrative record for the site.*”

The NDEP does not concur with the last two sentences in the above statement. See comments **1** and **8**.

8. NAS Fallon needs to address NDEP’s comments for Site 24 in the letter dated January 21, 1999. Comments in that letter which were not completely discussed above include the following:

Item 3 in NDEP’s January 21, 1999 letter

NDEP requested that metal concentrations in soil and groundwater at Site 24 be compared with background metal concentrations, and that a drawing which shows where the background samples were collected be provided. The Draft Final Decision Document responds by stating on page C-22 “*Comparison of metal concentrations to background metal concentrations will not be provided since metals are not the contaminants of concern at the site.*” This statement is not considered to be an appropriate response. Metals were determined to be potential contaminants of concern at Site 24. The PA/SI Report recommended on page 3-24 that priority pollutant metals be analyzed in samples collected from Site 24. During the RI/FS, eleven soil samples from Site 24 were analyzed for metals. The RI Report concludes on Page 6-4 “*The concentrations of metals may appear to be elevated, but when compared to other soil sample results for other sites on the facility, the concentrations are consistent with the regional range of values.*” The RI Report doesn’t describe what “*the other soil samples*” are, and doesn’t compare metal concentrations to the ARARs. The Decision Document needs to explain why metals are no longer considered contaminants of concern for both soil and groundwater. Metals concentrations need to be compared to the ARARs and/or background concentrations. NDEP previously commented on this issue in a letter dated March 5, 1996.

Page 3-24 of the PA/SI Report recommended that soil samples collected from Site 24 be analyzed for pesticides/PCBs by EPA method 8080. The subsequent RI/FS Work Plan for NAS Fallon states on page 1-60 “*The requested laboratory analyses for samples from each site are based upon contaminants or chemicals used, stored, or disposed of at the sites as listed in the PA/SI Report.*” Based on analytical results presented in the Draft Final Decision Document, soil samples collected from Site 24 were not analyzed for pesticides/PCBs. The RI/FS Work Plan for Site 24 does not appear to have been fully implemented. The basis for not including pesticides/PCBs in the analytical program needs to be provided.

Information or data that are used to support the “No Further Action” recommendation must be backed up with supporting documentation. Documentation does not need to be provided with the Decision Document, but needs to be present in NDEP’s files. Supporting documentation for Site 24 missing from the NDEP files are listed below.

- C Logs, with soil screening results, for the five borings drilled during the RI/FS.
- C Laboratory analytical reports.
- C Sampling and Analysis Plan for the RI/FS (Volume III of the RI/FS Work Plan).

NAS Fallon needs to either provide the supporting documentation, or state the supporting documentation does not exist and is not included in the Administrative Record.

9. Appendix C, page C-23, first sentence: The Draft Final Decision Document states: “*This site is not*

considered a potential human health or ecological risk as concluded in the RI.” According to documentation in NDEP’s files, a risk assessment was not conducted for Site 24. If a risk assessment was performed for Site 24, NAS Fallon needs to submit this documentation to the NDEP.